

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

UNITED STATES OF AMERICA)
)
)
vs.) No. 4:19CR00212 JM
)
)
KESHAWN BOYKINS)
aka "Turbo Hefner")

**UNITED STATES' NOTICE OF INTENT TO OFFER EXPERT TRIAL TESTIMONY
OF FBI SUPERVISORY SPECIAL AGENT JENNIFER TERRY**

The United States of America, by Jonathan D. Ross, United States Attorney for the Eastern District of Arkansas, and Benecia B. Moore, Assistant United States Attorney, for its notice, respectfully states:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the United States hereby provides notice to Defendant of the United States' intent to introduce expert testimony from Federal Bureau of Investigation (FBI) Supervisory Special Agent Jennifer Terry.

Jennifer Terry is a Supervisory Special Agent (SSA) with the Federal Bureau of Investigation.¹ SSA Terry entered onto duty as a Special Agent with the FBI in 2007, and, upon graduation from the FBI Academy, she was assigned to the New Orleans Field Office. SSA Terry's first assignment in the New Orleans Field Office was the Public Corruption Squad. In 2009, SSA Terry was transferred to the New Orleans Violent Crime Squad and began working Crimes Against Children matters with specific focuses on sex trafficking of children, child sex

¹ A copy of Supervisory Special Agent Terry's Curriculum Vitae has been provided to defense counsel.

tourism, and child abductions. In 2011, SSA Terry's investigative focus was expanded to include adult human trafficking and labor trafficking.

From 2011 to 2014, SSA Terry served as the Crimes Against Children Coordinator for the FBI New Orleans Division. In that capacity, she acted as liaison between federal and local agencies investigating sex trafficking and presented law enforcement's findings to state and federal prosecutor's offices. SSA Terry organized and led numerous multi-agency law enforcement operations focused on identifying and recovering victims of human trafficking. SSA Terry coordinated the New Orleans Division's participation in multiple national human trafficking operations. These operations, known collectively as "Operation Cross Country" were conducted annually by the FBI and resulted in the arrest of hundreds of sex traffickers and the recovery of thousands of victims.

SSA Terry has investigated over 100 child sex trafficking and human trafficking complaints. SSA Terry's investigative efforts have led to the successful prosecution of approximately 20 individuals for sex trafficking and numerous individuals for pandering and other prostitution-related crimes. SSA Terry has interviewed over 150 victims of sex trafficking and labor trafficking. In addition, SSA Terry has interviewed over 50 suspected sex traffickers.

To date, SSA Terry has received over 500 hours of training and instruction in the investigation of crimes against children and human trafficking. In addition, SSA Terry has provided trainings on these topics to law enforcement agencies, victim service providers, and other non-profit groups. Finally, SSA Terry has participated in media interviews focused on educating the general public about human trafficking.

In 2019, SSA Terry was promoted to Supervisory Special Agent and began serving as the Supervisor of the FBI New Orleans Child Exploitation Human Trafficking Task Force. SSA Terry manages five Special Agents and 5 Task Force Officers whose investigative focus is crimes against children and human trafficking. In her role as Supervisor, SSA Terry oversees all investigations and provides guidance on investigative techniques and investigative strategies. Due to her vast amount of experience related to sex trafficking, SSA Terry has been approved by the FBI Crimes Against Children Human Trafficking Unit to provide expert testimony.

SSA Terry is qualified to testify at trial as an expert in sex trafficking. Specifically, she can speak to the methods used by pimps to target vulnerable victims. Further, she can explain the dynamics between pimps and prostitutes, and the methods utilized by pimps to control their victims. Based on her experience interviewing victims of sex trafficking, SSA Terry can explain to the jury victims' tendencies to become compliant with their pimps, to feel shame and embarrassment about their conduct, and to blame themselves for the circumstances in which they are found. SSA Terry is also qualified to testify about the pimp/prostitute subculture and specialized language used therein, as well as the role of technology in trafficking activities.

The government expects that SSA Terry will be qualified to testify as an expert on common dynamics that occur in the sex trafficking relationship between a trafficker and a victim, including:

- (1) The typical means sex traffickers use to target, recruit, manipulate, and maintain victims. She will testify that there are different types of traffickers who use different methods to recruit and maintain the women for sex trafficking. SSA Terry will also describe how traffickers use victims to recruit, train, and maintain other victims.

(2) Common ways that sex traffickers target minors and tactics used to maintain control over victims' actions and to prevent victims from leaving the relationship. SSA Terry will describe intimate partner violence as a means of control commonly used by traffickers. Intimate partner violence includes physical force (e.g. beating, slapping, punching, strangling), sexual assault, psychological manipulation, social isolation, stalking, threats, and intimidation.

(3) By virtue of her experience interviewing those who have been trafficked, SSA Terry can explain the common reactions of victims of sex trafficking to the abuse. Many victims continue to express love and loyalty toward their pimp even after removed from the situation. Most minimize the number or extent of prostitution acts in which they engaged due to feelings of shame and embarrassment. Others express fear of their pimp, but typically that occurs only after the victim has been removed from the pimp's custody or care and feels safe from his grasp. And some victims express concern about being prosecuted themselves due to their participation in illegal conduct. For any/all of these reasons, victims of sex trafficking may not be completely forthcoming when questioned by law enforcement during the early stages of an investigation.

(4) Other information about the subculture of sex trafficking, including the meaning of certain terms such as "daddy," "pimp," "mack," and "Hefner." In this concept, SSA Terry will describe common dynamics between sex traffickers and their victims.

(5) SSA Terry is knowledgeable about the use and meaning of certain code words employed by those who engage in prostitution or who solicit sexual acts in exchange for money, and she can explain the significance of certain items, photographs, business records, and online forums/advertisements utilized in the commercial sex trade.

SSA Terry will not testify about the credibility of the victims or witnesses. In fact, SSA Terry has never met the victims, nor has she viewed any statements of the victims. SSA Terry will not interview the victims before trial. SSA Terry will testify as to sex trafficking victims in general terms, not the behavior exhibited by the victim in this case. SSA Terry may also be called upon to answer hypothetical questions regarding the above-described subjects based upon evidence already presented at trial.

The United States reserves the right to question the expert regarding other matters that may be raised during cross-examination by Defendant, based upon the testimony elicited from Defendant's experts, if any, or other witnesses, or the evidence introduced by Defendant. To the extent the Court allows Defendant the same right, the government reserves the right to elicit any additional testimony that this expert is qualified to provide should the need arise based on further developments in preparing for and during the trial.

Respectfully submitted,

JONATHAN D. ROSS
UNITED STATES ATTORNEY

BENECIA B. MOORE (2006050)
Assistant United States Attorney
Post Office Box 129
Little Rock, AR 72201
501-340-2600 phone
Benecia.Moore@usdoj.gov